

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Zulkia Maldonado :
Debtor : BANKRUPTCY NO.: 19-17645-elf

RESPONSE TO MOTION FOR RELIEF

Debtor, by their attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Neither admitted, nor denied. The facts contained in Movant's averment are on record before the Court and said information speaks for itself.
4. Admitted.
5. Admitted.
6. Admitted in part. It is admitted that the Debtor has failed to make some monthly post-petition mortgage payments. The Debtor denies the Movant's accounting of which payments and how many as referenced in the corresponding paragraph. By way of further response, the Debtor and the Movant have agreed to resolve any delinquency via a modified plan. A stipulation memorializing said agreement is to be filed.
7. No corresponding paragraph.
8. Admitted in part. It is admitted that the Debtor has failed to make some monthly post-petition mortgage payments. The Debtor denies the Movant's accounting of which payments and how many as referenced in the corresponding paragraph.
9. Denied. The averments set forth in this paragraph are denied as they are conclusions of law to which no response is necessary.
10. Denied. The averments set forth in this paragraph are denied as they are conclusions of law to which no response is necessary.

WHEREFORE, Debtor prays that the Movant's request for relief be denied.

Respectfully submitted,

Date: May 14, 2021

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor